

EXPERT CHEMIST QUESTIONS
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1. WHAT IS YOUR NAME?
2. WHERE DO YOU WORK?
3. HOW LONG HAVE YOU WORKED THERE?
4. WHAT TYPE OF WORK DOES THE LAB DO?
5. IS YOUR LAB ONE OF THE LABS DESIGNATED BY THE STATE TO PERFORM THE TESTING OF CONTROLLED SUBSTANCES AND ILLEGAL NARCOTICS IN THE COMMONWEALTH?
6. AND THAT IS PURSUANT TO THE MASSACHUSETTS GENERAL LAWS, CORRECT?
7. WHAT IS YOUR SPECIFIC TITLE AT THE LAB?
8. IS THERE A HIERARCHY OF JOB CLASSIFICATIONS AT THE LAB BASED UPON YOUR TRAINING AND EXPERIENCE?
9. WHAT DOES SOMEONE IN YOUR POSITION DO AT THE LAB?
10. WHAT IS YOUR ACADEMIC BACKGROUND, ESPECIALLY RELATING TO SCIENCE?
11. ANY SPECIAL AWARDS OR ACHEIVEMENTS FOR YOU WORK?
12. WHAT, IF ANY, SOCIETIES OR PROFESSIONAL GROUPS DO YOU BELONG TO?
13. WHAT SPECIFIC TRAINING HAVE YOU RECEIVED FOR YOUR WORK AT THE LAB?

14. IS THERE ONGOING TRAINING THAT YOU MUST COMPLETE TO KEEP UP WITH THE NEW DEVELOPMENTS IN YOUR FIELD?
15. ARE THERE EXERCISES YOU HAVE TO COMPLETE TO QUALIFY FOR YOUR POSITION AT THE LAB?
16. ARE THEIR PROFICIENCY EXAMS CONDUCTED BY THE LAB?
17. HOW ARE THOSE CONDUCTED?

18. DURING YOUR TIME AT THE LAB, HOW MANY POTENTIAL DRUG ANALYSES HAVE YOU PERFORMED, APPROXIMATELY?
19. HAVE YOU EVER TESTIFIED IN COURTS OF THE COMMONWEALTH OR ANY OTHER STATE REGARDING TESTING PROCEDURES IN RELATION TO POTENTIAL DRUG ANALYSIS?
20. HOW DO POTENTIAL DRUGS SENT IN FOR TESTING COME TO THE LAB?
21. ARE IDENTIFYING NUMBERS GIVEN TO EACH SET OF ITEMS YOU ARE REQUESTED TO TEST?
22. WHO PROVIDES THAT, THE LAB OR THE PARTY BRINGING IN THE ITEMS?
23. DO YOU RECEIVE IDENTIFYING INFORMATION, SUCH AS NAMES OF WHO BROUGHT THE ITEMS IN AND WHAT POLICE DEPARTMENT HE/SHE WORKS FOR?
24. EXPLAIN TO US WHAT YOU DO WHEN YOU ARE ASSIGNED A CASE AT THE LAB?
25. ARE YOU WORKING ON OTHER CASES AT THE SAME TIME OR DO YOU WORK ONE CASE FROM START TO FINISH BEFORE YOU MOVE TO THE NEXT CASE?

26. IS THIS PART OF THE STANDARD PROTOCOL?
27. ONCE AN ITEM IS PREPARED FOR TESTING, WHAT DO YOU DO NEXT?
28. AGAIN, PER PROTOCOL? ONCE THE ITEM HAS BEEN TESTED WHAT DO YOU DO NEXT?
29. HOW DO YOU MEMORIALIZE THE RESULTS OF TESTING?
30. IS THE TESTING EQUIPMENT CALIBRATED TO ENSURE IT IS WORKING PROPERLY?
31. HOW OFTEN IS IT CALIBRATED? (PRIOR TO EVERY USE/WEEKLY/MONTHLY/YEARLY)?
32. WHO PERFORMS THE CALIBRATION?

33. WHAT IF ANY REVIEW IS DONE TO ENSURE THAT YOUR TESTS AND RESULTS WERE PROPERLY ATTAINED?
34. WHO CONDUCTS THE REVIEW?
35. ONCE THE TESTS AND RESULTS HAVE BEEN REVIEWED, WHAT HAPPENS NEXT IN THE PROCESS?
36. EVENTUALLY, THE ITEMS ARE RETURNED TO THE SUBMITTING PARTY WITH A CERTIFICATE OF ANALYSIS, CORRECT?
37. NOW, DID YOU HAVE THE OPPORTUNITY ON JANUARY 9, 2004 TO ANALYZE AND/OR OBSERVE THE ITEMS LABELED FROM [REDACTED]?
38. WHAT TESTS IF YOU REMEMBER DID YOU PERFORM ON ANALYSIS # [REDACTED] WERE YOUR FINDINGS REVIEWED? (EXPLAINS) DID THE REVIEWER SIGN OFF ON YOUR TESTS, INDICATING HE/SHE AGREED WITH YOUR METHODOLOGY AND RESULTS? (EXPLAINS)
39. WHAT WAS THE RESULT OF THAT TESTING?

[REDACTED] = 1 PLASTIC BAG with powdery substance was found to contain 3.22 grams of COCAINE; a derivative of coca leaves as defined in chapter 94C, controlled substances act, section 31, a class b substance.

[REDACTED] = 3 PLASTIC BAGS W/ powdery substance was found to contain 9.99 grams OF COCAINE PURSUANT TO CH. 94C, SEC. 31, A CLASS B SUBSTANCE.

[REDACTED] = 9 PLASTIC BAGS with powdery substance, 1 randomly selected amongst the 9 similar size bags, was found to contain 0.08 grams OF Heroin, PURSUANT TO 94C, SEC. 31, A CLASS B SUBSTANCE. 3.

[REDACTED] = 13 PLASTIC BAGS W/POWDERY SUBSTANCE, 1 randomly selected amongst the similar size bags, CONTAINED 0.32 GRAMS OF COCAINE PURSUANT TO STATUTE (SEE ABOVE EXPLANATION).

[REDACTED] 8 plastic bags w/powdery substance, 1 randomly selected amongst the similar size bags, contained 0.55 grams of cocaine pursuant to statute (see above explanation).

[REDACTED] = 1 plastic bag w/powdery substance was found to contain 3.43 grams of cocaine.